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ANNE GOODWIN CRUMP*
VINCENT J. CURTIS, JR.
THOMAS J. DOUGHERTY, JR.
JAMES G. ENNIS
PAUL J. FELDMAN*
RICHARD HILDRETH
EDWARD W. HUMMERS, JR.
FRANK R. JAZZO
BARRY LAMBERGMAN
PATRICIA A. MAHONEY
GEORGE PETRUTSAS
LEONARD R. RAISH
JAMES P. RILEY
MARVIN ROSENBERG
LONNA M. THOMPSON
KATHLEEN VICTORY*
HOWARD M. WEISS

FLETCHER, HEALD & HILDRETH

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ROSSLYN, VIRGINIA 22209

P. O. BOX 33847

WASHINGTON, D.C. 20033-0847

PAUL D.P. SPEARMAN
(1936-1982)
FRANK ROBERSON
(1936-1981)

RETIRED

RUSSELL ROWELL
EDWARD F. KENEHAN
BERT L. HEALD
FRANK U. FLETCHER

OF COUNSEL

EDWARD A. CAINE

FEDERAL COMMUNICATIONS CONSULTANT
HON. ROBERT F. LEE

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MAY 28 1983

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Replacement of Part 90 by Part 88)
to Revise the Private Land Mobile)
Radio Services and Modify the)
Policies Governing Them)

PR Docket 92-235

COMMENTS OF
THE AMERICAN MOBILE RADIO ASSOCIATION, INC.

AMERICAN MOBILE RADIO
ASSOCIATION, INC.

George Petrutsas
Its Attorney

FLETCHER, HEALD & HILDRETH
1300 N. 17th Street - 11th Floor
Rosslyn, Virginia 22209
(703) 812-0400

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SUMMARY

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**COMMENTS OF
THE AMERICAN MOBILE RADIO ASSOCIATION, INC.**

The American Mobile Radio Association, Inc. ("AMRA"), by counsel, respectfully submits its comments in response to the Commission's Notice of Proposed Rule Making ("Notice") in the above-captioned proceeding.

Preliminary Statement

AMRA is a new, "grass roots" association. It was formed because of the deep concern of many land mobile radio licensees, users and equipment dealers about several of the Commissions proposals in this proceeding. The Association's membership includes radio equipment dealers and many and diverse users of land mobile radio communications across the country.

The Association agrees with the Commission's basic goal in this proceeding, which is understood to be to increase substantially the communications capacity of the land mobile

operation in the 70-76, 150-174, and 401-512 MHz bands through

of existing systems by January 1, 1996, if adopted, would impose enormous costs on existing land mobile licensees. AMRA also disagrees with the proposal to limit drastically transmitter power, about the proposal to consolidate the existing services into three broad categories, with the proposal to siphon off one third of the "new" frequencies in the 150-174 MHz band for so-called "innovative shared use operations", among others. The Association's comments on these and other proposals follow:

Implementation of Narrowband Technologies

AMRA believes that, while the Commission should move ahead and "re-farm" the land mobile radio spectrum in the bands below 512 MHz, the Commission should follow a path different than the path it proposed in its Notice. AMRA believes that the Commission's proposals for the implementation of narrowband and other technologies in the land mobile radio services are unrealistic and would be very burdensome. For example, as stated above, adoption of the proposal to require existing licensees to narrowband their existing systems by January 1, 1996, so as to make possible the assignment and use of the "new" narrow channels, would be very costly and disruptive. Narrowbanding existing systems is not a simple matter, as the Commission apparently believed. Narrowbanding would require the substantial overhaul of the radio transmitting as well as of the receiving equipment in existing

systems.¹ Moreover, the channelization of the land mobile spectrum in the VHF and UHF bands proposed in the Notice, which is based, respectively, on 5 and 6.25 kHz channels, may not be appropriate. Experience with narrowband (5 kHz) operations has been extremely limited. AMRA believes that it would be wise to wait and evaluate the experience with the development and performance of narrowband

AMRA supports LMCC's proposal for the 421-512 MHz bands.² With respect to the 150-174 MHz band, AMRA recommends adoption of LMCC's Option B.³ Briefly, Option B is preferable to Option A for the following reasons. First, under Option B, the number of assignable frequencies would be increased by approximately a factor a three when the plan is implemented by the year 2004. Under Option A, the increase would be approximately 15-16%, or a gain of one frequency for every group of six. Moreover, under Option A, licensees would probably have to replace their radio equipment again some time after 2004. Clearly, LMCC's Option B is far better than Option A and should be adopted.

However, the Commission may also want to consider evaluating the status of narrowband technology and the experience with it in a rule making proceeding to be conducted in the 1998-2000 time frame by which time there will have been some "real world" experience with 5 kHz systems in the 220-222 MHz band. AMRA recommends that the Commission include such an action in its

² LMCC's plan for the 450-470 MHz band contemplates the use

overall "refarming" plans.

Power Limits

AMRA opposes strongly the Commission's power limits set out in proposed Section 88.429(d). Those power/antenna height limits are unrealistically low. Many, if not most, licensees would not be able to provide the coverage they need and would have to install additional repeater stations. Repeater sites are scarce, however, they are costly and raise environmental and zoning concerns. The additional sites, additional repeater equipment, and the additional installation and maintenance costs would increase substantially the overall cost of land mobile systems. Moreover, the proposed power/height limits would be counterproductive in many cases because those who need coverage of relatively large areas would be forced to use additional frequencies in order to satisfy their coverage requirements. Such use of additional spectrum would defeat the spectrum conservation objectives of the proposal.

Therefore, AMRA respectfully suggests that the proposed power limits set out in proposed Section 88.429(d) should not be adopted. Instead, AMRA urges the Commission to adopt the power/height tables recommended in LMCC's Consensus Plan. Those tables provide for authorizing only the power/height facilities necessary to accommodate the coverage requirements of most land mobile users. They also provide the flexibility needed to match power/height to be authorized with the many and varying coverage requirements of land mobile licensees. There is no such thing as standard or typical land mobile service areas.

LMCC also recommend adoption of tables of required mileage separations between co-channel stations, rather than the uniform 50-mile separation proposed in the Notice, which separations would be consistent with the coverage requirements of the co-channel stations involved. Those tables are reasonable and should be adopted as well.

In sum, LMCC's recommendations for authorized power and antenna heights in the private land mobile radio services are reasonable and would go a long way towards achieving the Commission's spectrum conservation objectives. Therefore, AMRA urges the Commission to adopt them.

Service Consolidation

AMRA's members respectfully also disagree with the Commission's proposal to consolidate the existing radio services into three broad categories; public safety, commercial and non-commercial. The Commission has not explained adequately why it wishes to abolish a spectrum management program that has served the interest of land mobile users so well for over half a century. The proposal to lump all land mobile licensees into three arbitrary groupings ignores the specialized requirements for land mobile communications of many user groups, the inherent different priorities in the use of radio, and the successful experience with the current spectrum allocation and management program.

In short, AMRA believes that the allocation of the land mobile spectrum in the very broad categories the Commission has proposed would not be in the public interest. Moreover, the method for

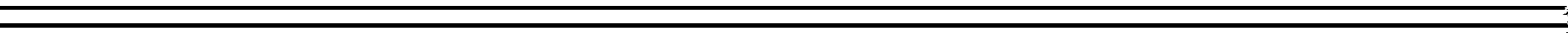










selecting and coordinating frequencies contemplated by the Commission -- under which several coordinators would pick frequencies out of the same pool -- would simply not work. This is because neither the required common data base nor the means for creating and updating such a base in real time are available. To establish such a system would be very costly, if indeed, it would be feasible. Without such a facility, confusion and inconsistent frequency recommendations would result.

Therefore, AMRA urges the Commission to drop its service consolidation proposal, or, if service consolidation is important to the Commission, the Commission should group together services that are compatible and have had a history of successful frequency sharing.

Innovative Shared Use Operations

AMRA also disagrees with the proposal to set aside 258 narrowband frequency pairs in the 150-174 MHz band, for so-called innovative shared use (ISU) operations, briefly, for the following reasons. First, the members of AMRA are not aware of any substantial needs for land mobile service over the large areas contemplated. Secondly, the large number of frequencies would serve a much better purpose in the services or groups of services where they would normally be allocated. Finally, setting aside one out of three "new" frequencies for ISU operations would make it impossible for applicants for such operations or for applicants in the various service to "stack" together a sufficient number of consecutive frequencies that may be needed for such spectrum

efficient systems as digital, TDMA, etc. that may require relatively wide channels. Therefore, adoption of this proposal may inhibit rather than promote development of spectrally efficient systems. AMRA notes that LMCC in its consensus plan also recommends rejection of the ISU proposal. AMRA fully agrees with LMCC on this matter.



90.243 of the Commission's current Rules.

Community Repeater Operations

AMRA believes that community repeater operations should continue to be authorized. However, if the Commission decides to discontinue them, existing systems should be grandfathered indefinitely, as proposed, or should be converted to private carrier operations and should be licensed routinely to the owners of the repeaters.

Cooperatives

AMRA urges the Commission to retain its long-standing rules in the Industrial and the Land Transportation Radio Services under which non-profit cooperatives may be licensed to provide land mobile communications service to eligible entities. Co-ops have successfully provided service in many areas of the country, where private or commercial systems would not have been economically practical. The Commission has not explain its reasons for eliminating this useful licensing option.

Conclusion

AMRA urges the Commission to take the foregoing comments into account in reaching its decision in this important proceeding.

Respectfully submitted,

AMERICAN MOBILE RADIO
ASSOCIATION, INC.

By: 

George Petrutsas

Its Attorney

FLETCHER, HEALD & HILDRETH
1300 N. 17th Street - 11th Floor
Rosslyn, Virginia 22209
(703) 812-0400

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